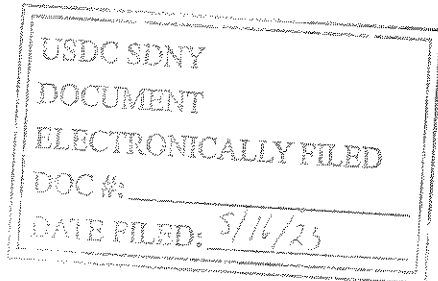


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May 16, 2023

**STATUS REPORT; REQUEST FOR  
EXTENSION OF TIME TO ANSWER;  
REQUEST FOR ORDER TO MEDIATE**

**BY ECF**

Honorable Colleen McMahon, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: **Freddy Almonte Jerez v. Milea Truck Sales Corp., et. al.**  
**Case No. 23 Civ. 2562 (CM)**

Dear Judge McMahon,

We are counsel to the plaintiff and we write jointly with defense counsel, with reference to the court's order dated March 28, 2023 [Docket 5] to report that counsel conferred and respectfully request that the court refer the case to mediation and further order that mediation occur within the next sixty (60) days. The parties have selected an experienced private mediator, Daniel Engelstein, Esq., and have conferred regarding the timing for informal exchange of records, calculations and settlement positions followed by a virtual mediation session.

We respectfully request the court stay current deadlines including the time for defendants to file a response to the complaint and the initial conference, pending the outcome of mediation; and order the parties to report to the court on the outcome of mediation promptly thereafter.

This is a joint request. Thank you for your consideration of this case.

Respectfully submitted,

/s/ Peter H. Cooper

Peter H. Cooper

cc: Counsel of Record (Via E-mail and ECF)  
Daniel Engelstein, Esq., Mediator (Via E-mail)

5/16/2023  
Refer to the order  
with M. Engelstein  
Deadline  
stay  
pending  
mediation